

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MONTANA
BILLINGS DIVISION**

CHARLES M. BUTLER, III and
CHOLE BUTLER,

Plaintiffs,

v.

UNIFIED LIFE INSURANCE
COMPANY, HEALTH PLANS
INTERMEDIARIES HOLDINGS, LLC,
D/B/A HEALTH INSURANCE
INNOVATIONS, HEALTH
INSURANCE INNOVATIONS, INC.,
ALLIED NATIONAL, INC.,
NATIONAL BROKERS OF
AMERICA, INC., THE NATIONAL
CONGRESS OF EMPLOYERS, INC.,
and DOES 1-10,

Defendants.

Cause No. CV 17-50-SPW-TJC

**PLAINTIFF'S PROPOSED CLASS
MANAGEMENT
ORDER**

The Parties shall adhere to the following schedule for management of the class claims:

1. January 15, 2020. Unified Life Insurance Company (Unified) shall produce to the Court and class counsel the names, addresses, and other contact information Unified possesses for all class members organized by state by this

date. The data shall be provided in an excel document with a separate heading for each data category.

2. March 2, 2020. Notice shall be mailed to Class members by this date. Class counsel shall create and launch an informational website and call center support by this date as well. Contact information for the website and call center will be included in the Notice.
3. March 2, 2020. Unified shall produce the following information:
 - a. For each class member, a calculation of the amount owed on each claim using the actual charge in place of the Data iSight discounted amount that was used when the claim was initially adjusted.
 - b. For each class member, Unified may also produce a calculation of the amount owed on each claim using the usual charge in the three-digit ZIP code geographic area at the time the claim was adjusted in place of the Data iSight discounted amount that was used when the claim was initially adjusted.
 - c. For each class member the amount paid on each claim.
 - d. A total of the amounts calculated under a, b, and c.
 - e. Electronic access to all documentation substantiating the calculations described in a, b, c, and d.

4. April 1, 2020. Disclosure of expert witnesses and any documentation Plaintiffs submit supporting alternative calculation of categories identified in Paragraph 3.
5. April 15, 2020. Disclosure of rebuttal expert reports.
6. May 4, 2020. Close of limited discovery period regarding Unified's cross claim against MultiPlan. The limited discovery period begins upon date of filing of this Order.
7. May 15, 2020. Class counsel shall file with the clerk a list of all class members who did not opt out and another list of those who did opt out.
8. May 15, 2020. Deadline for filing of dispositive motions.

To the extent consistent with the above schedule of deadlines, Paragraphs 2-13 of the existing Scheduling Order (Doc. 66) shall continue to govern these proceedings.

DATED this ____ day of _____, 2019.

By: _____
DISTRICT COURT JUDGE